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September 9, 2021

Via ECF

Hon. Ronnie Abrams, U.S. District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Cardona v. Saul, Comm'r of Soc. Sec.
Docket No.: 1:20-CV-10323-RA

Dear Judge Abrams:

I represent the plaintiff, Ginette Cotto Cardon, in the above-referenced matter seeking review of the denial of Social Security benefits. Assistant U.S. Attorney Susan Baird represents the Commissioner.

I write in accordance with Your Honor's Individual Practice Rules to request a 60-day adjournment of the briefing schedule as follows:

	<u>Current Deadline</u>	<u>New Deadline</u>
Plaintiff's Motion	Sept. 13, 2021	Nov. 12, 2021
Defendant's Cross/Opposition	Nov. 12, 2021	Jan. 11, 2022
Plaintiff's Reply	Dec. 3, 2021	Feb. 1, 2022

I make this request because delays in producing the Administrative Record due to the COVID-19 Pandemic in almost all of my Social Security lawsuits has led to multiple scheduling conflicts in September and October. I have already had to prepare and file briefs in 2 other cases in another District this month, and I have another brief due on September 14, 2021 (which had already been adjourned). As a result, I cannot complete my moving papers by the current deadline.

I have consulted with Ms. Baird, and she consents to this request. Plaintiff has not made any prior requests for an adjournment on this case, although the Commissioner was given two (2) adjournments (on consent) to produce the Administrative Record.

If any additional information is needed in connection with this request, please do not hesitate to contact me. Thank you for your consideration of this request.

Respectfully submitted,
THE DEHAAN LAW FIRM P.C.

By: /s/ John W. DeHaan
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Application granted.

SO ORDERED.

Hon. Ronnie Abrams
09/10/21

cc: AUSA Susan Baird (via ECF)